

## **ADMINISTRATIVE POLICY 3-27**

**SUBJECT:** Social Media Policy

**PURPOSE:** To provide guidance and establish regulations to be followed by all City of Lawton employees when using social media so that the City achieves high standards in communication that reflect positively on the City and complies with applicable local, state and federal laws and regulations.

**BACKGROUND:** Social media services and tools are powerful and effective means of communication that reach broad audiences to share information. The City of Lawton recognizes that the appropriate use of social media improves transparency in conducting City business; encourages civic engagement in City projects, programs and initiatives; fosters effective dissemination of information; and promotes the City and its services and programs.

**SCOPE:** This policy applies to all employees in all City departments and divisions and includes all forms of social media platforms. Use of social media for official or personal use, on or off duty, is addressed in this policy.

**DEFINITIONS:** Terms used in this policy are defined as follows:

1. Social Media: various forms of discussion and information-sharing, including social networks, blogs, video and picture sharing, podcasts, instant messaging, wikis, message boards and online forums. Technologies include, but are not limited to, the following:
  - Media Sharing, such as: YouTube, Flickr, Snapchat, iTunes
  - Blogging/Microblogging, such as: WordPress, Blogger, Twitter
  - Document and Data Sharing Repositories, such as: Scribd, SlideShare, Socrata
  - Social Bookmarking: Delicious, Digg, Reddit
  - Social Networking, such as: Facebook, MySpace, LinkedIn, Ning
  - Widgets: Google Maps, AddThis, Facebook "Like"
2. Social Networking: The practice of expanding business and/or social contacts by making connections or reaching various audiences and sharing information through web-based applications.

3. Official/Official use: Social media engagement as authorized by the City Manager's Office on behalf of the City of Lawton.
4. Non-Official/Personal Use: Personal day-to-day use of any social media sites by City of Lawton employees that is not related to job duties.
5. Employee: Any unelected person receiving compensation from the City of Lawton.

## **RESPONSIBILITIES:**

1. It is the responsibility of the City of Lawton to make this policy accessible to all employees; it is the responsibility of employees to review and comply with the guidelines and regulations outlined in this policy. Any question or need for clarification should be addressed to an employee's department director and, if necessary, the City Manager's Office.
2. Designated administrators who are chosen by the City Manager's Office to manage or administer official City social media platforms will be trained by the Community Relations Director regarding the provisions of this policy.
3. Employees who are not approved in connection with their duties to access social media sites for official business are prohibited from accessing social media sites utilizing City of Lawton computing equipment and City systems. While at work, employees who are not granted access via City systems and computing equipment may use personal computing devices and personal web accounts to access social media sites only during non-working hours such as lunch periods and breaks.
4. Employees are required to abide by all guidelines, procedures and rules within this policy. Violations may result in disciplinary action, up to and including termination of employment.

## **PROCEDURES:**

1. **General Administration**
  1. All official City social media platforms will be managed by the Community Relations Director through the City Manager's Office. Certain employees will also

be designated by the City Manager's Office to help administer official City of Lawton social media platforms. Each official City page shall have at least two administrators.

2. City social media sites shall be used for the purpose of notifying platform users about City information and events that are of general interest to the public. They shall not be routinely used as a means to resolve issues, report emergencies or report time-sensitive issues. Administrators should direct users to other official avenues of communication for such matters, such as email and telephone, as outlined in Council Policy 1-12, Social Media User Policy.
3. Non-city or non-cosponsored events and information shall generally not be shared on City social media platforms. Exceptions may be authorized by the City Manager or Community Relations Director.
4. Departments/divisions without social media administrators that wish to share relevant information to the official City social media sites may submit a request to the Community Relations Director by email or phone.
5. The City's Website, [www.lawtonok.gov](http://www.lawtonok.gov), will remain the primary online location for content regarding City business, events and services. Whenever possible, links within the social media formats should direct users back to the City's website for more information, forms, documents or online services necessary to conduct business with the City of Lawton. Likewise, links to all social media networks to which the City belongs will be listed on the City's official website.
6. When possible, information shared to official City social media pages should also be shared to [lawtonok.gov](http://lawtonok.gov).
7. Each social media platform used by the City of Lawton shall include a copy of, or link to, Council Policy 1-12, Social Media User Policy. Platforms should also direct users back to the City's website when appropriate.
8. Information intended to remain permanently posted to City social media platforms must be approved by the Community Relations Director.
9. All use of social media sites on official City platforms by employees shall be in compliance with Oklahoma's Open Records and Meeting Acts. Disclosure of certain types of personal information, for example, is strictly prohibited from release.



10. If a question arises regarding the use or posting of certain information on an official social media platform, the matter shall be referred to the Community Relations Director. If warranted, the matter will then be submitted to the City Manager's Office and, if necessary, the City Attorney's Office for review.
11. City employees entrusted with administering or managing official social media platforms will maximize the quality, objectivity and accuracy of all content disseminated.

## **2. Platform Establishment**

1. Departments/divisions may not have their own social media pages, platforms or sites, unless they have been proposed to the Community Relations Director and granted by the City Manager.
2. All page or platform proposals should include the need for such a platform, a date range if applicable, the intended purpose and audience, and the reason internal or existing resources cannot be efficiently and effectively used. Requests should also identify appropriate resources, including staff and funding for production and management of services when applicable.
3. The Community Relations Director will have administrative access to all Departmental and/or Divisional pages for the City.
4. All social media-based services to be developed, designed, managed by or purchased from any third-party source for use requires appropriate budget authority and approval from the IT Supervisor, Community Relations Director and the City Manager, and compliance with the City's purchasing policy.

## **3. Chat Functions**

1. Chat functions or messaging applications associated with social media platforms of the City will not be used by administrators without special permission from the City Manager's Office.
2. A record of chats or messages between citizens and City government employees in relation to City business or services will be maintained by platform

administrators designated by the City Manager's Office. These records shall be accessible to the Community Relations Director and City Manager.

#### 4. **Official Posting/Commenting Guidelines**

1. The City will not comment on postings on other social media sites or platforms.
2. All social media postings by the City will be done solely on City social media platforms or in response to postings made on the City's social media platforms. The City may "share" or "repost" relevant information from other official sources of information online, when warranted.

**PROHIBITED USES:** When using social media for official City use, the following types of postings by employees are strictly prohibited at all times. This is a representative list and does not include all prohibitions that would violate City policies and procedures or state and federal laws. Postings in violation of these regulations will be subject to immediate removal by other page administration with the potential of the poster being banned from further use of the webpage without notice. Appropriate law enforcement authorities will be notified of users who post or convey threats to an individual or any city departments, employees, or the like.

- Postings of a sexual nature, involving racial slurs, the making of intentionally false or malicious statements, the endorsement of any political candidates or ballot propositions, the promotion of illegal activity, the posting of threats, or containing solicitations, general spam or the use of profanity.
- Postings that promote, foster or perpetuate discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation.
- Postings of information with the potential to compromise the safety or security of the public or public systems.
- Postings of copyright material without proper consent.
- Postings of off-topic comments, arguments or postings meant to incite arguments; an entire thread of comments including postings from individuals not associated with the argument itself may be removed in order to restore an air of civility.
- Postings of personal attacks of any kind.

- Postings of confidential information to which the employee has access as part of the employee's role or duties, i.e. health information, billing information, bank accounts, etc.
- Postings of legally protected personal information to which the employee has access or has obtained from the City, i.e. addresses, date of birth, driver's license number, social security number, etc.
- Postings otherwise in violation of Council Policy 1-12, Social Media User Policy.
- Postings in violation of the City's Internet Usage Policy.

The City of Lawton reserves the right to block and remove content that is deemed in violation of this policy or any applicable law, and the right to temporarily suspend or permanently ban access to the official City social media sites at any time. The blocking or removal of postings/comments shall be based on content neutral standards. Content neutral standards includes notice that the site is a moderated online site, and that while postings/comments will not be blocked or removed from the site based strictly on their content generally, postings such as those listed above are subject to immediate blocking/removal. All postings/comments that are blocked or removed from City social media sites shall be retained until such time as the City Attorney advises otherwise.

Note that in some cases, to aid in investigations of law enforcement, certain comments that do not coincide with this policy may be left on official City pages for a certain period of time, as authorized by the Community Relations Director and/or City Manager.

**NON-OFFICIAL/PERSONAL USE STANDARDS:** Personal use involves use of social media by an employee speaking as an individual, not for or on behalf of the City of Lawton. An employee's use and comments made on social media sites are subject to limited First Amendment protections. As a public employee, use of social media is considered an extension of the workplace as it relates to employee conduct. As a City of Lawton employee, personal use of social media is subject to the following:

1. Where personal use is related to a matter of public concern, it must be conducted in such a manner that a reader would not think the employee is speaking for or on behalf of the City. When speaking on matters of public concern, employees' interests in doing so must be weighed against the City's interest in providing effective and efficient services to the public.
2. Employees should be mindful of blurring their personal and professional lives when administering or participating in social media. Employees must conduct



themselves in ways that do not distract from or disrupt the governmental process or create conflicts of interest for themselves or their employer.

3. All employees, especially those with public-facing positions for which their association is known to the general public, should ensure the content that is shared on non-official social media profiles and platforms is consistent with how such employees wish to present themselves as City of Lawton representatives.
4. Personal use of social media may not violate or infringe upon the right of any other person or entity or constitute a criminal offense or create civil liability.
5. Because the internet is public domain, only designated spokespersons or appointed social media platform managers for the City of Lawton may make any online postings about City policies or procedures at any time.
6. Employees may not publish false, vicious or malicious statements concerning any employee or City department at any time.
7. City of Lawton employees must never use their work email account in conjunction with a personal social networking account.
8. Publicly-displayed personal employee statements in violation of applicable law or City policies that are posted to social media platforms will be removed, or requested to be removed. These statements will also be documented and reported to department supervisors as grounds for disciplinary action.
9. Employees are not permitted to answer any digital inquiries posted to official City media from personal pages.

**OFFICIAL USE STANDARDS:** City social media platforms and applications, regardless of the date of establishment or whether maintained internally or externally, must adhere to City policies and protocols. These include the following:

1. Use of social media sites shall meet best practices for maintaining social media such as, but not limited to, frequent updates and accurate information.
2. All sites are subject to Oklahoma's laws on public records and retention.
3. All sites shall meet requirements for accessibility by the disabled.
4. Social media sites may not be used for political activity.

5. All sites shall comply with City policies and procedures for information security.
6. Information created for or posted on social media sites by City employees shall comply with all privacy protection laws to protect the privacy of employees, privacy of citizens and the confidential information that the City maintains.

**OFFICIAL USE PROTOCOLS:** Each City employee approved for official use of social media shall utilize the following protocols:

1. In responding to questions or comments of City-related matters on social media in one's official capacity, each employee must identify himself/herself and their role at the City.
2. Be mindful that information published in social media constitutes a public record and as such, will be retained to the extent required by Oklahoma law and/or City policy.
3. Promptly admit to and correct mistakes, and do not enter into altercations. Present facts when correcting users who have made misrepresentations about the City, using only City sponsored social media sites to provide correct information.
4. Always exercise sound judgment and discretion so as not to reflect adversely on the City in contributing to social media sites. When in doubt, consult with the Community Relations Director.

**REFERENCES:** N/A

**RESPONSIBLE**

**DEPARTMENT:** City Manager

**RECISSION:** This policy supersedes Administrative Policy 3-27 dated March 8, 2018, and will remain in effect until rescinded.



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MICHAEL CLEGHORN



*CITY MANAGER*

*DATE 3/31/2021*